

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 15 CR 50026
v.)	
)	Judge Matthew F. Kennelly
ADRIAN C. PETERS)	

**MOTION FOR ENTRY OF A
PRELIMINARY ORDER OF ABANDONMENT**

The UNITED STATES OF AMERICA, through JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for entry of a preliminary order of abandonment pursuant to 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, and in support thereof submits the following:

1. On June 30, 2015, an indictment was returned charging defendant Adrian C. Peters with production of child pornography, in violation of 18 U.S.C § 2251(a) (Counts One through Twelve).

2. During the investigation that led to the indictment in this case, law enforcement officers seized a Hitachi hard drive with serial number F32SG0WD; and a Lenovo IdeaPad U530 Touch laptop computer, model 20289, with serial number QB07697478 (the seized property”).

3. On December 12, 2019, pursuant to Fed R. Crim. P. 11, defendant Adrian C. Peters entered a voluntary plea of guilty to Counts 5, 11, and 12 of the indictment. Pursuant to the terms of the plea agreement, defendant Adrian C. Peters agreed that property was involved in the offense as alleged in of the indictment. Further, defendant Adrian C. Peters agreed to forfeit his interest in the subject

property.

4. Pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, the government requests the entry of a preliminary order of abandonment directing the United States to dispose of the subject property.

5. Pursuant to the provisions of 41 C.F.R. § 128-48.102-1, the United States shall publish notice of the abandonment order on an official government website which shall provide notice of its intent to dispose of the subject property according to law. The government shall hold the forgoing property for a period of 30 days from the date of the first publication of notice. Upon the expiration of the 30-day notice period, title to such property shall vest in the United States.

6. Following the Court's disposition of all third-party interests, the Court, if appropriate, shall declare the subject property abandoned, which shall vest clear title in the United States of America.

WHEREFORE, pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, the United States requests that this Court enter a preliminary order of abandonment as to the subject property.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

By: /s Michael Love
MICHAEL LOVE
Assistant United States Attorney
327 South Church Street, Suite 3300
Rockford Illinois 61101
(815) 987-4444

CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that on September 26, 2022, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document:

Motion for Preliminary Order of Abandonment

was served pursuant to the district court's ECF system as to ECF filers.

/s/ Michael D. Love

MICHAEL D. LOVE

Assistant United States Attorney
327 South Church Street, Suite 3300
Rockford, Illinois 61101
(815) 987-4444